

JOSEPH H. HARRINGTON
Acting United States Attorney
Eastern District of Washington
Stephanie J. Lister
David M. Herzog
Assistant United States Attorneys
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUL 11 2017

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

2:17-CR-120-TOR

Plaintiff,

INDICTMENT

vs.

Vio: 18 U.S.C. § 2252A(a)(2)

CHRISTOPHER TURNER,

Distribution of Child

Pornography (Count 1)

Defendant.

18 U.S.C. § 2252A(a)(5)(B)

Possession of Child

Pornography

(Count 2)

18 U.S.C. § 2253

Notice of Forfeiture

Allegations

The Grand Jury Charges:

COUNT 1

(Distribution of Child Pornography)

Between on or about August 2, 2015, and August 15, 2015, within the Eastern District of Washington, the Defendant, CHRISTOPHER TURNER, having a prior conviction under the laws of the State of Washington relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, to wit: Rape of a Child in the Second Degree, did knowingly distribute child pornography, as

INDICTMENT - 1

1 defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in
2 interstate commerce by any means, including by computer, to wit: still image and
3 video files depicting minor and prepubescent children engaging in sexually explicit
4 conduct, including but not limited to actual and simulated intercourse and the
5 lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C.
6 § 2252A(a)(2).

7
8 COUNT 2

9 (Possession of Child Pornography)

10 On or about September 29, 2015, within the Eastern District of Washington, the
11 Defendant, CHRISTOPHER TURNER, having a prior conviction under the laws of
12 the State of Washington relating to aggravated sexual abuse, sexual abuse, or abusive
13 sexual conduct involving a minor or ward, to wit: Rape of a Child in the Second
14 Degree, did knowingly possess material which contained one or more visual
15 depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), the production
16 of which involved the use of a minor who had not attained 12 years of age engaging in
17 sexually explicit conduct, and which visual depictions were of such conduct; that had
18 been mailed, shipped and transported in interstate and foreign commerce, and which
19 was produced using materials which had been mailed, shipped, or transported in
20 interstate and foreign commerce, by any means including computer, all in violation of
21 18 U.S.C. § 2252A(a)(5)(B).

22
23 NOTICE OF FORFEITURE ALLEGATIONS

24 The allegations contained in Counts 1 - 2 of this Indictment are hereby
25 realleged and incorporated by reference for the purpose of alleging forfeitures
26 pursuant to 18 U.S.C. § 2253.

27 Upon conviction of the offense(s) alleged in Counts 1 - 2 of this Indictment,
28 Defendant, CHRISTOPHER TURNER, shall forfeit to the United States, pursuant to

1 18 U.S.C. § 2253, any visual depiction described in section 2251, 2251A, 2252,
2 2252A, 2252B, or 2260 of Chapter 110 of Title 18 of the United States Code, or any
3 book, magazine, periodical, film, videotape, or other matter which contains any such
4 visual depiction, which was produced, transported, mailed, shipped or received in
5 violation of this chapter; any property, real or personal, constituting or traceable to
6 gross profits or other proceeds obtained from such offenses; and, any property, real or
7 personal, used or intended to be used to commit or to promote the commission of such
8 offenses, or any property traceable to such property, including but not limited to:

- 9 (1) One (1) Homemade Desktop Computer, no serial number,
- 10 (2) Two (2) USB thumb drives,
- 11 (3) One (1) Hitachi external computer hard drive, bearing serial number
12 JP2940HZ0TS1LC, and
- 13 (4) Fourteen (14) miscellaneous CDs/DVDs.

14 If any of the above described forfeitable property, as a result of any act or
15 omission of the Defendant:

- 16 (1) cannot be located upon the exercise of due diligence;
- 17 (2) has been transferred or sold to, or deposited with, a third party;
- 18 (3) has been placed beyond the jurisdiction of the court;
- 19 (4) has been substantially diminished in value; or
- 20 (5) has been commingled with other property which cannot be divided
21 without difficulty,

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated
2 by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of said Defendant up
3 to the value of the forfeitable property described above.

4
5 DATED this 11 day of July, 2017.

6 A TRUE BILL

7
8
9 Foreperson _____

10
11 
12 JOSEPH H. HARRINGTON
13 Acting United States Attorney

14
15 
16 Stephanie J. Lister
17 Assistant United States Attorney

18 
19 David M. Herzog
20 Assistant United States Attorney